

Honeywell International

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Dr. Meredith Williams
Deputy Director
California Department of Toxic Substances Control
1001 I Street
Sacramento, CA 95814

Re: Comments on the DTSC Priority Product Profile for “Spray Polyurethane Foam Systems Containing Unreacted Diisocyanates,” March 2014

Honeywell International Inc. (“Honeywell”) appreciates the opportunity to comment on the California Department of Toxic Substance Control (DTSC) Priority Product Profile regarding “Spray Polyurethane Foam (“SPF”) Systems Containing Unreacted Diisocyanates” issued March 2014. Honeywell respectfully requests that DTSC remove Spray Polyurethane Foam (“SPF”) Systems from its priority products list. Honeywell strongly believes that the vast weight of evidence provided to the DTSC by the American Chemistry Council (ACC), spray foam industry and other industry experts supports this determination.

Honeywell is a global technology and manufacturing company that seeks to address some of the world’s toughest challenges linked to global macro trends such as energy efficiency, clean energy generation, safety and security, globalization and customer productivity. With approximately 132,000 employees worldwide, including more than 22,000 engineers and scientists, we sell a wide range of products across many industries, including aerospace products, performance materials, process technologies, and home and building controls

One of Honeywell’s business units supplies foam expansion agents to the spray polyurethane foam (“SPF”) industry. Foam expansion agents are used for enhanced thermal performance and are an essential component of high-performance closed cell spray foam insulation products. Honeywell does not manufacture spray polyurethane foam insulation systems, nor does it manufacture products that contain unreacted diisocyanates. These products are manufactured by certain of our customers who purchase foam expansion agents from us.

As a Responsible Care company, Honeywell takes great pride in developing, manufacturing and selling products that are safe for consumers and the environment. As a spray foam industry partner, Honeywell works closely with trade associations, contractors, designers and owners to enhance spray foam product offerings, as well as meet the needs of stringent industry codes and energy efficiency standards.

Honeywell concurs with the comments submitted by the American Chemistry Council (ACC) that SPF systems have not been properly categorized and that the hazards and risks of using this product have not been properly communicated. The facts provided for the record to DTSC show that:

- The health concerns raised by DTSC are not attributed to the use of SPF.

- Industry has demonstrated that workers are protected and risks are mitigated through comprehensive training, jobsite measures and oversight.
- Comprehensive and credible data submitted by industry experts justifies the removal of SPF from the list of priority products.
- Given the safety record and lack of evidence that the product is a threat to public health, Honeywell strongly believes that it should be removed from the list of priority products.

As a board member of the Spray Polyurethane Foam Alliance (SPFA) and Leadership Committee member of the Spray Foam Coalition (part of ACC), Honeywell has been a key contributor to installer certification programs and is engaged at various levels of industry research, advocacy and training. Honeywell works closely with the ACC, SPFA and government agencies as an industry leader for the advocacy and development of standards that promote the safe use and enhanced benefits of spray polyurethane foam insulation. SPF is uniquely suited to help meet rigorous industry codes and standards that have delivered a 30% increase in energy efficiency over the last 6 years. SPF is also a key component of sustainability and “green and beyond” code initiatives that drive superior performance and net zero goals of DOE, CEC, Title 24, LEED and other agencies/programs. As a versatile material, SPF provides multiple performance benefits in a single product that cannot be duplicated. The benefits unique to closed cell SPF include:

- Higher energy efficiency through consistent thermal performance
- Low air permeability - SPF provides air barrier performance
- Multiple functionality in a single product reduces issues with product compatibility when multiple trades and products are coordinated
- SPF exhibits low moisture transmission - qualifying SPF as a vapor retarder material beneficial in colder climates
- Permanent adhesion to substrates and long-term durability - no settling or sagging that compromises performance
- Low water absorption - Only FEMA-approved flood resistant insulation
- High strength and stiffness - providing structural enhancement for building assemblies

Honeywell supports ACC’s positions asserting that SPF has been categorized inaccurately and does not warrant listing as a priority product. Industry organizations such as ACC and SPFA have provided extensive documentation and reputable studies to support the removal of SPF from the priority products list. Honeywell respectfully requests that DTSC take the wide array of third-party scientific data into account, which clearly demonstrates the safety of SPF, and remove spray polyurethane foam from its list of priority products.

Sincerely,



Sanjeev Rastogi
Global Business Director – Structural Enclosures
Honeywell